ROUTING AND TRANSMITTAL SLIP

Date: 3/28/94

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REMARKS

Here's that survey of UIC programs and their requirements for idle wells.

TEMPORARY AND PERMANENT ABANDONMENT POLICIES

Region 2 - Charles Hildebrandt

The plugging deadline is set for 2 yrs. after ceasing injection, following this deadline, the operator must perform MI or P&A to obtain an extension for P&A deadline.

He feels the Osage policy is reasonable, considering the situation and condition of the wells, reservoir pressures, etc. Their DI program in New York has to deal with a lot of older wells. Many of them have high reservoir pressure and have been referred to DOJ to enforce plugging.

Region 3 - Steve Platt

Their program allows a well to be TA'd for 2 yrs., then they must P&A or show reason to retain well within 90 days. In addition to extend the TA status, they must either run a MIT, or set up a monitoring program for fluid levels. Once the fluid level gets to critical height, the requirements begin including water quality checks for chlorides, oil and grease, etc.

Their program is mostly in NW Pennsylvania, lately there has been coal bed methane activity in Virginia.

Region 4 - Mallory Miller

The TA period is for 2 years, then must P&A or run internal and external MIT to qualify for another 2 years. The only fluid level monitoring is on packerless injection wells.

The program is basically a 2 year clock and is mainly in Kentucky.

Region 5 - Nathan Wiser (permitted wells)

They have no fluid level monitoring. The 2 year clock, MIT procedures, etc. are written into the permit conditions. The well must be tested or 40 CFR 144.52(a)(6) gives operator right to request alternatives and extensions, but these are considered special cases by Region 5.

The Class II wells in the DI program are located in Michigan and are newer wells. The primacy states Indiana and Illinois have oldest wells.

Chad Kinchloe (authorized by rule wells)

TA wells must establish non-endangerment by MIT, which is good for 2 years. An alternative method will be considered, but he's not seen any in his program. The MIT is only for 300 psi, some wells have more. Operators seem happy.

Region 8 - John Carson

The UIC section monitors the annual reports for TA wells. When one is discovered, a non-compliance letter is written requiring P&A or the operator may request an extension. The extension requires that they pass MIT every 2 years. They don't have any wells similar to the Osage.

Region 9 - Martin Zeleznik

A well goes on TA for a maximum of 2 years before conducting MIT or applies for alternative method.

California Division of Oil and Gas and Geothermal Recovery (CDOGGR) - Mike Stettner

After a one year clock a well is switched from active to inactive. Once inactive, the authority to inject is suspended and must apply for authority to be reinstated. Inactive wells are inspected annually by field, district personnel. The oldest wells may require more monitoring, but such cases are left up to the districts.

The "Idle Well Program" includes all wells and annual tests (such as RAT, etc.), similar to Osage. Requests for extension to plugging deadline is based on good engineering and geology. California requires operators to provide either an annual fee of $100 or post a $5000 bond for plugging and abandonment. So far, an account set-up to fund P&A operations brings in about $50,000 per year.

New Mexico Oil Conservation Division (NMOCD) - David Catanach

Once a well has gone through 6 months of non-injection, authority to inject is lost. An operator can have well put on TA for 5 years before renewing. The well must demonstrate MI with a CIPB with pressure test or casing inspection log, etc.

Oklahoma Corporation Commission UIC - Bruce Langhus

A two year clock runs the intervals in which a well can be kept exempt from having to P&A. The well must prove MI with a minimum of 300 psi. The maximum time a well may be on TA is only for 4 years though. After four years of TA, the well must either resume injection, convert to production, or P&A.

Utah Division of Oil and Gas and Mining (UDOGM) - Gil Hunt

TA status is renewed every year with justification. A MIT is required every 5 years which is usually a pressure test, or alternatives to pressure test (such as fluid monitoring) are decided on a case-by-case basis. After 5 years of TA, the well must either be P&A'd or justifications continue on annual schedule.

UDOGM has included this ruling on TA wells into their UIC regulations just last year.

Texas Railroad Commission (RRC) - Jeff Fuller

Some wells are on a 5 year schedule and some are on the short schedule (renewals are made annually). MITs are required on most wells, but on a case-by-case, fluid levels are accepted. Districts conduct inspections and pressure tests are required before injection can resume.

Navajo Environmental Protection Administration (Navajo EPA) - Jim Walker

Their regs are very much the Federal regs at this point in their moving toward primacy. TA can be extended with proper justification.